

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

CORPORATIVO GRUPO R SA de C.V.,	§	Civil Action No. 4:19-cv-01963
	§	
Plaintiff,	§	
	§	
v.	§	
MARFIELD LIMITED INCORPORATED	§	
And SHANARA MARITIME	§	
INTERNATIONAL, S.A.	§	
	§	
Defendants.	§	

NOTICE TO COURT

Plaintiff Corporativo Grupo R SA de C.V. (“Grupo R”), by and through its attorneys Blank Rome LLP, respectfully submits the following Notice to the Court to clarify the involvement and role of Gulf Copper Dry Dock & Rig Repair (“Gulf Copper”) with respect to Grupo R’s recent attachment of the vessels CABALLO MAYA and CABALLO MARANGO (collectively, the “Vessels”).

1. Gulf Copper is currently not a party to the above-captioned litigation. However, the Vessels are currently berthed at Gulf Copper’s wharf on Pelican Island, Texas, and undersigned counsel understands they have been at that location for some time. Upon information and belief, the Vessels are in a state of disrepair and are unable to move under their own power from Gulf Copper’s wharf.
2. On Friday, May 31, 2019, Grupo R obtained an *Order Directing Issuance of Writ of Attachment* (“Order”) to attach the Vessels pursuant to TEX. CIV. PRAC. & REM. CODE

§ 61.001, *et. Seq.* See Dkt. 7). Later that day, the Clerk of Court issued a *Writ of Attachment* (“Writ”) for the Vessels. See Dkt. 9.

3. On Tuesday, June 4, 2019, the U.S. Marshal for the Southern District of Texas served the Order and Writ upon the Vessels, and also served a copy of these documents upon Gulf Copper as well, as the Vessels are berthed at Gulf Copper’s Wharf.
4. On Tuesday, June 4, 2019, Gulf Copper’s counsel (Mr. David James of Clark Hill Strasburger) contacted undersigned counsel to express concern that the Writ suggested Gulf Copper would serve and act as the substitute custodian for the Vessels in connection with this litigation. Undersigned counsel and Mr. James conferred on this point via telephone conversation and email that afternoon, at which time undersigned counsel confirmed that Plaintiff has not designated or authorized Gulf Copper to act as the “substitute custodian” in this instance with respect to the CABALLO MAYA and the CABALLO MARANGO.
5. Gulf Copper requested that undersigned counsel for Grupo R confirm this position to the Court and to the U.S. Marshal, and Grupo R respectfully submits this Notice in response to Gulf Copper’s counsel’s request.

Dated: Houston, Texas
June 5, 2019

Respectfully submitted,

BLANK ROME LLP

/s/ Jeremy A. Herschaft
Jeremy A Herschaft (Attorney-In-Charge)
State Bar No. 24091970
Federal I.D. No. 2450990
Keith B. Letourneau
State Bar No. 00795893
Federal I.D. No. 20041

Jay T. Huffman
State Bar No. 24059980
Federal I.D. No. 870092
717 Texas Avenue, Suite 1400
Houston, Texas 77002
Telephone: (713) 228-6601
Facsimile: (713) 228-6605
Email: jherschaft@blankrome.com
Email: kletourneau@blankrome.com
Email: jhuffman@blankrome.com

***ATTORNEYS FOR CORPORATIVO
GRUPO R SA de C.V.***

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of June, 2019, I caused the foregoing to be electronically filed with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants. I have also delivered a copy of this Notice to the following individuals by e-mail:

- David James, Esq.
Clark Hill Strasburger
2615 Calder Ave., Suite 240
Beaumont, TX 77702
David.James@clarkhillstrasburger.com

- Deputy U.S. Marshal Joseph Castro, USMS
Southern District of Texas Courthouse
515 Rusk Street, 10th Floor
Houston, TX 77002
Joseph.Castro@usdoj.gov

/s/ Jeremy A. Herschaft
Jeremy A. Herschaft